

STORCH AMINI PC

2 Grand Central Tower
140 East 45th Street, 25th Floor
New York, NY 10017
Telephone: (212) 490-4100
Bijan Amini, Esq.
Avery Samet, Esq.
Jaime B. Leggett, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

TRANSCARE CORPORATION, et al.

Debtors.
-----X

Case No.: 16-10407 (SMB)
(Jointly Administered)

SALVATORE LAMONICA, as Chapter 7
Trustee for the Estates of TransCare
Corporation, et al.,

Adv. Pro. No. 18-1021

Plaintiff,

v.

LYNN TILTON, PATRIARCH
PARTNERS AGENCY SERVICES, LLC,
PATRIARCH PARTNERS, LLC,
PATRIARCH PARTNERS MANAGEMENT
GROUP, LLC, ARK II CLO 2001-1,
LIMITED, ARK INVESTMENT PARTNERS
II, L.P., LD INVESTMENTS, LLC,
PATRIARCH PARTNERS II, LLC,
PATRIARCH PARTNERS III, LLC,
PATRIARCH PARTNERS VIII, LLC,
PATRIARCH PARTNERS XIV, LLC,
PATRIARCH PARTNERS XV, LLC,
TRANSCENDENCE TRANSIT, INC., and
TRANSCENDENCE TRANSIT II, INC.

Defendants.
-----X

NOTICE OF TRUSTEE'S MOTION TO MODIFY SCHEDULING ORDER

PLEASE TAKE NOTICE on September 28, 2018, Salvatore LaMonica, as Chapter 7 Trustee

(the “Trustee”) of the jointly-administered estates of TransCare Corporation, et al.¹, by his undersigned counsel, filed his motion (the “Motion”) for entry of an order amending the existing scheduling order [Dkt. No. 7] to extend the deadline for Completion of Fact Discovery from October 26, 2018 to Monday, December 17, 2018 and providing corresponding adjustments to the later deadlines and pre-trial hearing date, and that a hearing will be held before the Honorable Stuart M. Bernstein in Room 723 of the United States Bankruptcy Court for the Southern District of New York (the “Court”), One Bowling Green, New York, New York 10004, on **October 4, 2016 at 10:00 a.m. (EST)**.

PLEASE TAKE FURTHER NOTICE any responses to the Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and be filed with the Court (electronically, in accordance with General Order M-399, by registered users of the Court’s electronic filing system, and by all other parties, on a 3.5-inch disk or CD-ROM, preferably in PDF or a Windows-based word processing format, in each case with a hard copy delivered to Chambers) and served upon the Trustee’s attorneys, Storch Amini PC, Attn: Avery Samet, 2 Grand Central Tower, 25th Floor, 140 East 45th Street, New York, New York, 10017, so as to be received by **October 1, 2016 at 4:00 p.m. (EST)** pursuant to Local Bankruptcy Rule 9006-1.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be granted without a hearing if no response is timely filed and served as set forth above.

¹ The jointly-administered estates are as follows: TransCare Corporation. TransCare New York, Inc., TransCare ML, Inc., TC Ambulance Group, Inc., TransCare Management Services, Inc., TCBA Ambulance, Inc., TC Billing and Services Corporation, TransCare Westchester, Inc., TransCare Maryland, Inc., TC Ambulance North, Inc., TransCare Harford County, Inc., TransCare Pennsylvania, Inc., TC Ambulance Corporation, and TC Hudson Valley Ambulance Corp.

Dated: September 28, 2018
New York, New York

STORCH AMINI PC

Special Counsel to Salvatore LaMonica, as Chapter 7
Trustee

By: /s/ Avery Samet
Jaime B. Leggett, Esq.
Bijan Amini, Esq.
Avery Samet, Esq.
2 Grand Central Tower
140 East 45th Street, 25th Floor
New York, New York 10017
Telephone: (212) 490-4100